

# SEEGERWEISS LLP

May 21, 2018

**Via ECF**

Honorable Anita B. Brody  
United States District Judge  
Eastern District of Pennsylvania  
601 Market Street  
Room 7613  
Philadelphia, PA 19106

Re: *In re National Football League Players' Concussion Injury Litigation*,  
No. 12-md-2323-AB

Dear Judge Brody:

As Co-Lead Class Counsel, I respectfully submit this letter to oppose the letter request of counsel for Phillip T. Howard and the Cambridge Entities for an extension until June 4, 2018 (ECF No. 10003) to respond to the Motion for an Order Sanctioning the Cambridge Entities for Failure to Comply with the Court's February 20, 2018 Order and for other relief, filed on May 8, 2018 (ECF No. 9974). While ordinarily we do not oppose requests of adversaries for extensions to respond to motions, the circumstances relating to this Motion are unique and preclude our extending opposing counsel the usual courtesies. We conveyed the reasons set forth below to Mr. Leonard when he contacted my office last week.

We first reminded Mr. Leonard that Mr. Howard's email to my partner, TerriAnne Benedetto, dated March 6, 2018, on which Mr. Leonard was copied, indicated that he was representing Mr. Howard concerning the prior motion related to the Cambridge Entities, filed on January 26, 2018 (ECF No. 9578). Having been advised previously of Mr. Leonard's representation, Ms. Benedetto served him with a copy of the instant Motion for an Order Sanctioning Cambridge via email and via Federal Express, on May 8, 2018.

Importantly, I am constrained as a fiduciary to the Class to oppose the extension because the ten Class Members whose retirement monies were "invested" with Cambridge have been requesting information about their account balances for months, to no avail, and to their continuing consternation. Cambridge and Mr. Howard have been aware of these requests and Class Members' frustration for months. Since the April 2, 2018 hearing, many of these Class Members telephone or email my office weekly to inquire as to when Cambridge will be providing the accountings and returning their monies. Most notably, Cambridge is in continuing violation of the Court's February 20, 2018 Order (ECF No. 9750); hence, we filed the Motion for Sanctions.

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Therefore, Co-Lead Class Counsel objects to the request for an extension. To the extent that the Court is inclined to allow an extension, we respectfully request that it be limited to one week, i.e., until Tuesday, May 29, 2018.

Respectfully,

/s/ Christopher A. Seeger  
Christopher A. Seeger  
*Co-Lead Class Counsel*

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter.

Dated: May 21, 2018

/s/ Christopher A. Seeger  
Christopher A. Seeger